

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

In Re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

as a representative of

THE COMMONWEALTH OF PUERTO RICO
et al.

Debtors.¹

PROMESA Title III

No.: 17-BK-3283-LTS
(Jointly Administered)

**This filing relates to the
Commonwealth.**

MOTION SUBMITTING EXHIBIT LIST
FOR DECEMBER 14-15, 2022 OMNIBUS HEARING WITH REGARDS TO
EMPRESAS OMAJEDE'S RESPONSE TO 519TH OMNIBUS OBJECTION

TO THE HONORABLE UNITED STATES DISTRICT JUDGE LAURA TAYLOR SWAIN:

COMES NOW, EMPRESAS OMAJEDE INC., by and through the undersigned counsel, and, submits its Exhibit List.

1. On November 23, 2022, the Honorable Court entered an Order setting forth the procedures for the omnibus hearing scheduled for December 14-15, 2022. (The "221123 Procedures Order") Dkt. 22907

2. The 221123 Procedures Order requires any party that intends to appear in person at the December Omnibus Hearing to file an exhibit list with all of its documentary evidence as attachments to said list. Dkt. 22907

3. The Debtor's **519th Omnibus Objection** (Dkt. 22254) was originally scheduled for the Nov. 2-3, 2022 Omnibus Hearing, when the Debtor adjourned said

¹ The Last Four Digits of the Federal Tax ID of the Commonwealth of Puerto Rico (the Debtor in Bankruptcy Case No. 17- BK-3283 (LTS)) is 3481.

objection solely with respect to Empresas Omajede's First Amended Claim (Claim # 70324) to the Dec. 14-15, 2022 omnibus hearing. Dkt. 22755

4. As said matter is currently scheduled for the Dec. 14-15, 2022 Omnibus Hearing, Empresas Omajede intends to appear, solely with respect to said matters and solely in the Omnibus Hearing, unless said matter is further adjourned by Debtor to a later omnibus hearing or the Court grants Empresas Omajede's request that the adjudication of the **519th Omnibus Objection** be stayed with respect to the Empresas Omajede Claim, until the adjudication of adversary proceeding 22-ap-00076-LTS in accordance with Fed. R. Bankr. P. 3007(b).

5. Therefore, in compliance with the requirements of the 221123 Procedures Order, Empresas Omajede files this motion to submit its exhibit list and to submit as attachments to its exhibit list those documents to be listed in **Exhibit C** to its Informative Motion and which it may present as evidence (solely in the Omnibus Hearing). Empresas Omajede reserves all rights, including the right to use exhibits identified on other parties' exhibits lists, the right to use additional exhibits for cross-examination or rebuttal if necessary, and the right to revise, amend, and/or supplement this list, for reasons including but not limited to adjournment of the **519th Omnibus Objection** with respect to the Empresas Omajede Claim to a later omnibus hearing.

WHEREFORE, Empresas Omajede, Inc. respectfully requests that the Court take notice of the submitted documentary evidence and exhibit list; and grant any

other relief that it deems just and proper or that may be granted under Puerto Rico law or in equity.

CERTIFICATION OF SERVICE: IT IS HEREBY CERTIFIED that, on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a true and exact copy of this paper to all registered participants, including Ricardo Burgos Vargas and Martin J. Bienenstock, the attorneys for the Financial Oversight and Management Board for Puerto Rico as representative for the Commonwealth of Puerto Rico.

RESPECTFULLY SUBMITTED.

In San Juan, PR, this 7th day of December, 2022.

DML | Diaz Mayoral Law
Attorney for Empresas Omajede Inc.

s/ Monique Diaz Mayoral
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**EMPRESAS OMAJEDE'S
EXHIBIT LIST**

Exhibit Identifier	Description of Exhibits
EO A	Lease Agreement with certified translation
EO B	Acceptance and Registration with certified translation
EO C	Lease Amendment and Registration with certified translation
EO D	First Letter with certified translation
EO E	Second Letter with certified translation
EO F	Customer Ledger with certified translation
EO G	Invoices with certified translation
EO H	Letter to PSC with certified translation
EO I	Initial POC
EO J	First Amended POC
EO K	Second Amended POC